

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE ALTA MESA RESOURCES, INC. SECURITIES LITIGATION	CASE NO. 4:19-CV-00957 (CONSOLIDATED) JUDGE GEORGE C. HANKS, JR. THIS DOCUMENT RELATES TO: CASE NO. 4:22-CV-01189 CASE NO. 4:22-CV-02590
--	---

**THE DIRECT ACTION PLAINTIFFS’ UNOPPOSED MOTION TO SEAL (1)
THE DIRECT ACTION PLAINTIFFS’ REPLY IN FURTHER SUPPORT OF
THEIR MOTION TO EXCLUDE THE TESTIMONY OF STEVEN J. PULLY
AND TO PARTIALLY EXCLUDE THE TESTIMONY OF CHARLES
WHITEHEAD (DKT. 618)**

The Alyeska Plaintiffs and the Orbis Plaintiffs¹ (collectively, the “Direct Action Plaintiffs”) respectfully request leave to file under seal unredacted copies of (1) the Direct Action Plaintiffs’ Reply in Further Support of their Motion to Exclude the Testimony of Steven J. Pully and to Partially Exclude the Testimony of Charles Whitehead (the “Reply”) (Dkt. 618).

¹ The “Alyeska Plaintiffs” are: Alyeska Master Fund, L.P., Alyeska Master Fund 2, L.P., and Alyeska Master Fund 3, L.P. The “Orbis Plaintiffs” are: Orbis Global Equity LE Fund (Australia Registered), Orbis Global Equity Fund (Australia Registered), Orbis Global Balanced Fund (Australia Registered), Orbis SICAV, Orbis Institutional Global Equity L.P., Orbis Global Equity Fund Limited, Orbis Institutional Funds Limited, Allan Gray Australia Balanced Fund, Orbis OEIC, and Orbis Institutional U.S. Equity L.P.

As grounds for this motion, the Direct Action Plaintiffs state as follows:

1. On August 17, 2021, the Court entered the Stipulation and Protective Order (“PO”) (Dkt. 190), which governs the handling of confidential information exchanged in discovery in this matter.

2. According to Paragraph 24 of the PO, “[i]f any party submits Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material to the Court, the submission must be filed only under seal on CM/ECF if filed electronically[.]” PO at ¶ 24 (emphasis added).

3. The Direct Action Plaintiffs’ Reply contains, describes and refers to non-public documents and information that have been designated by the parties and nonparties as Confidential Discovery Material or Confidential Attorney Eyes Only Discovery Material, pursuant to the PO.

4. On February 1, 2024, prior to the filing of the Reply, the Direct Action Plaintiffs asked counsel for all Defendants and the Class Plaintiffs by e-mail if they opposed the filing of the Reply under seal, and no counsel opposed or objected to the filing.

5. Today, pursuant to the PO, the Direct Action Plaintiffs filed the Reply under seal. The Direct Action Plaintiffs will file a public, redacted version of the Reply within five (5) business days.

6. The Direct Action Plaintiffs are bound by the provisions of the PO, and therefore must, and now do, seek leave to file the Reply under seal.

THEREFORE, the Direct Action Plaintiffs request that the Court grant their request for leave to file under seal unredacted copies of the Reply.

Dated: February 2, 2024

Respectfully submitted,

By: /s/ Lawrence M. Rolnick

Lawrence M. Rolnick

Michael J. Hampson

Matthew A. Peller

Joseph R. Sparacio

ROLNICK KRAMER SADIGHI LLP

1251 Avenue of the Americas

New York, New York 10020

(212) 597-2800

lrolnick@rksllp.com

mhampson@rksllp.com

mpeller@rksllp.com

jsparacio@rksllp.com

*Attorneys for the Alyeska and Orbis
Plaintiffs*

Jules P. Slim

TX Bar No. 00793026

Attorney and Counselor

PO Box 140307

Irving, TX 75014-0307

Tel.: (214) 350-5183

Fax: (214) 350-5184

jslim@slimlawfirm.com

*Counsel for the Alyeska and Orbis
Plaintiffs*

CERTIFICATE OF SERVICE

I certify that this motion has been served on counsel of record via the Court's ECF system on February 2, 2024.

/s/ Lawrence M. Rolnick

Lawrence M. Rolnick

CERTIFICATE OF CONFERENCE

I certify that on February 1, 2024, counsel for the Direct Action Plaintiffs conferred by e-mail with counsel for all Defendants and the Class Plaintiffs regarding the substance of this Motion. No parties opposed.

/s/ Lawrence M. Rolnick

Lawrence M. Rolnick